

WILLKIE FARR & GALLAGHER LLP

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

LORI C. ARAKAKI (SBN: 315119)

larakaki@willkie.com

ARGEMIRA FLOREZ (SBN: 331153)

aflorez@willkie.com

Attorneys for
GOOGLE LLC

UNITED STATES DISTRICT COURTS

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Magistrate Judge Alex G. Tse
Courtroom A - 15th Floor
Trial Date: Not Yet Set

Pursuant to Civil Local Rule 79-5, Defendant Google LLC (“Google”) respectfully asks the Court to consider whether Plaintiffs’ material should be sealed. The material is included within Exhibit D to the parties’ joint letter brief regarding Plaintiffs’ privilege log.

Document Sought to be sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Exhibit D	Plaintiffs	Portions highlighted in teal on pages 1, 2, 3, and 4.	Contains material designated “Confidential” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Plaintiffs, as the Designating Party, bear the responsibility to establish that the designated material is sealable.

Dated: May 6, 2022

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Eduardo E. Santacana
Eduardo E. Santacana

Eduardo E. Santacana (SBN: 281668)
esantacana@willkie.com
Benedict Y. Hur (SBN: 224018)
bhur@willkie.com
Simona Agnolucci (SBN: 246943)
sagnolucci@willkie.com
Lori Arakaki (SBN: 315119)
larakaki@willkie.com
One Front Street, 34th Floor
San Francisco, CA 94111
Telephone: (415) 858-7400
Facsimile: (415) 858-7599

Attorneys for Defendant Google LLC